

Defendant.

3. Defendant has not yet completed its investigation of the allegations contained in Plaintiff's Complaint, including but not limited to which defenses may operate to bar Plaintiff's claims.

4. A twenty-one (21) day extension of the deadline for filing an answer would allow Defendant to complete its investigation and file a more complete and thorough response to Plaintiff's Complaint.

5. The additional time will not prejudice the parties insofar as this motion constitutes Defendant's initial appearance, allowing the parties to proceed with scheduling the parties' planning meeting.

6. Plaintiff's counsel has been consulted and has no objection to the granting of this motion.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests the Court to allow it an additional twenty-one (21) days, up to and including December 7, 2018, to respond to Plaintiff's complaint.

Respectfully Submitted,

s/ Michael L. Thompson
Michael L. Thompson
ASB-5417-O46M

OF COUNSEL:
LEHR MIDDLEBROOKS VREELAND & THOMPSON, P.C.
P.O. Box 11945
Birmingham, Alabama 35202-1945
(205) 326-3002
Fax: (205) 326-3008
Email: mthompson@lehrmiddlebrooks.com

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following

Allen D. Arnold, Esq.
Five Points Law Group
2151 Highland Avenue South, Suite 205
Birmingham, Alabama 35205

Leslie Palmer, Esq.
Palmer Law, LLC
104 23rd Street South, Suite 100
Birmingham, AL 35233

s/ Michael L. Thompson

OF COUNSEL

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